

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL COALITION ON BLACK CIVIC  
PARTICIPATION, MARY WINTER, GENE  
STEINBERG, NANCY HART, SARAH  
WOLFF, KAREN SLAVEN, KATE KENNEDY,  
EDA DANIEL, and ANDREA SFERES,

Plaintiffs,

-and-

People of the STATE OF NEW YORK, by its  
attorney general, LETITIA JAMES, ATTORNEY  
GENERAL OF THE STATE OF NEW YORK

Plaintiff-Intervenor,

v.

JACOB WOHL, JACK BURKMAN, J.M.  
BURKMAN & ASSOCIATES, LLC, PROJECT  
1599, and JOHN and JANE DOES 1-10,

Defendants.

Civil Action No. 20-cv-8668

**NOTICE OF MOTION FOR PLAINTIFF NEW YORK ATTORNEY GENERAL'S  
MOTION *IN LIMINE* TO RULE AS A MATTER OF LAW ON THE NUMBER OF  
"VIOLATIONS" OF CIVIL RIGHTS LAW § 40-C**

For the reasons set forth in Plaintiff's Memorandum of Law, Plaintiff New York State Attorney General respectfully requests that this Court instruct the jury that, as a matter of law, each call Defendants sent to New York phone numbers constitutes a "violation" of law compensable under New York Civil Rights Law § 40-d and that Defendants committed at least 5,494 statutory violations.

Dated: New York, New York  
June 22, 2023

Respectfully submitted,

**LETITIA JAMES**

*Attorney General  
State of New York*

By: /s/ Rick Sawyer

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